

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RAYMOND ANTHONY SMITH, as
Administrator of the Estate of George Eric
Smith, deceased

and

Katherine Soulas, Executrix of the Estate of
Timothy Soulas, deceased

Plaintiffs,

v.

THE TALIBAN, et al.

Debtors,

and

THE FEDERAL RESERVE BANK
OF NEW YORK

Garnishee.

CASE NO. 01-cv-10132-HB

**NOTICE OF MOTION FOR AN ORDER DIRECTING ALTERNATIVE
SERVICE UPON THE TALIBAN AND DA AFGHANISTAN BANK**

PLEASE TAKE NOTICE that the undersigned attorneys for plaintiffs, Raymond Anthony Smith, Administrator of the Estate of George Smith, and Katherine Soulas, Executrix of the Estate of Timothy Soulas (the "Smith-Soulas Creditors") respectfully move this Court for the entry of an Order directing alternative service of the Smith-Soulas Creditors' Motion for Partial Turnover of Assets from Garnishee Federal Reserve Bank of New York upon the Taliban and upon Da Afghanistan Bank, and for such other and further relief as the Court deems appropriate.

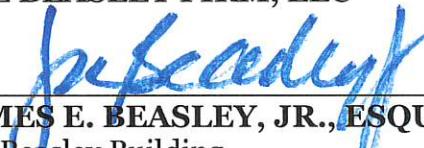
This Motion is brought pursuant to the Federal Rules of Civil Procedure, including Rules 69(a) and 4(f)(3), this Honorable Court's prior Order in this case regarding Service, Smith v. Islamic Emirate of Afghanistan, No. 01 Civ. 10144 (HB),

2001 U.S. Dist. LEXIS 21712 at *7 (S.D.N.Y. Dec. 20, 2001), and the Honorable Magistrate Sarah Netburn's 5 April 2022 Opinion and Order in Havlish v. Bin Laden (In re Terrorist Attacks on September 11, 2001), No. 03-MD-01570 (GBD)(SN), 2022 U.S. Dist. LEXIS 63505 (S.D.N.Y. Apr. 5, 2022).

In support of this Motion, the Smith-Soulas Creditors submit their Memorandum of Law in Support of the Smith-Soulas Creditors' Motion for an Order Directing Alternative Service Upon the Taliban and Da Afghanistan Bank, and a Proposed Order Granting the Smith-Soulas Creditors' Motion for Alternative Service Upon the Taliban and Da Afghanistan Bank.

Respectfully submitted,

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